

Message

---

**From:** Lazos, Pamela [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=15D4F11C6327474BB424A24CBD406E93-PLAZOS]  
**Sent:** 4/15/2021 2:28:15 PM  
**To:** Levine, Bradley (ENRD) [Bradley.Levine@usdoj.gov]; Ahearn, Devon (ENRD) [Devon.Ahearn@usdoj.gov]  
**Subject:** FW: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene  
**Attachments:** BWB complaint in intervention 9-8-16.pdf; BWB reply motion to intervene 9-1-16.pdf; City's Response to motion to intervene 8-15-16.pdf; Response to motion to intervene 8-15-16.pdf

Here's the first. One more to follow.

---

**From:** Rivera, Nina <Rivera.Nina@epa.gov>  
**Sent:** Thursday, April 08, 2021 7:42 AM  
**To:** Lazos, Pamela <Lazos.Pamela@epa.gov>; Mastro, Donna <Mastro.Donna@epa.gov>  
**Subject:** RE: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene

Here are filings related to the enviros' intervention in the Nonresponsive based on external case CD mod. We accepted the intervention after we filed to reopen and modify the CD. I have to see if I can find the earlier attempt at intervention which we opposed and the court rejected.

---

**From:** Lazos, Pamela <Lazos.Pamela@epa.gov>  
**Sent:** Wednesday, April 07, 2021 4:12 PM  
**To:** Rivera, Nina <Rivera.Nina@epa.gov>; Mastro, Donna <Mastro.Donna@epa.gov>  
**Subject:** FW: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene  
**Importance:** High

Also, this just in. It's sad because EPA was ready to go with this waaaaaay back at the end of 2020 and here we are in April with a citizen suit because of our slowness. According to Devon, they have not made substantive changes to the CD mod so I'm not sure what's holding up the process.

I'm leaving for the rest of the day but will be back in tomorrow.

Thanks,  
Pam

---

**From:** Williams, Janna <jannwillia@pa.gov>  
**Sent:** Wednesday, April 07, 2021 12:13 PM  
**To:** Lazos, Pamela <Lazos.Pamela@epa.gov>  
**Cc:** Herb, Dawn <dherb@pa.gov>  
**Subject:** FW: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene  
**Importance:** High

Hi Pam,

We just received the below email from EIP regarding CRW's Consent Decree. Dawn and I would like to have a meeting to discuss. Would you provide some dates and times you and your team are available? I wasn't sure who all to forward to so please feel free to pass this along.

Best,  
Janna Williams

**Janna Williams** | Assistant Counsel  
Office of Chief Counsel | South Central Regional Counsel  
Department of Environmental Protection  
909 Elmerton Avenue | Harrisburg, PA 17110-8200  
Phone: 717.783.8301 | Fax: 717.772.2400  
[www.depweb.state.pa.us](http://www.depweb.state.pa.us)

*The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.*

---

**From:** Lisa Widawsky Hallowell <[lhallowell@environmentalintegrity.org](mailto:lhallowell@environmentalintegrity.org)>  
**Sent:** Wednesday, April 7, 2021 11:38 AM  
**To:** [bshuman@pa.gov](mailto:bshuman@pa.gov); Williams, Janna <[jannwillia@pa.gov](mailto:jannwillia@pa.gov)>  
**Cc:** Sylvia Lam <[slam@environmentalintegrity.org](mailto:slam@environmentalintegrity.org)>  
**Subject:** [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene  
**Importance:** High

**ATTENTION:** *This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to [CWOPA\\_SPAM@pa.gov](mailto:CWOPA_SPAM@pa.gov).*

Dear Janna:

Pursuant to Local Rule 7.1 of the Local Rules for the United States District Court for the Middle District of Pennsylvania, I am writing on behalf of the Lower Susquehanna Riverkeeper Association ("LSRA") to seek your concurrence for LSRA to move to intervene as a Plaintiff in the matter *U.S. et al v. Capital Region Water*, Civil Action No. 1:15-cv-00291-CCC, in the Middle District of Pennsylvania. In advance of filing LSRA's motion to intervene as a Plaintiff in this action, please let us know your client's position regarding this motion. Beth Shuman is listed as counsel of record, but given that I believe she has retired, I am writing to you since you met with us on this matter – please let me know if there is another attorney for the Department that I should contact.

In addition, there is no counsel of record listed for the City of Harrisburg; do you know if there a counsel contact person for the City of Harrisburg that should be consulted, or has their involvement ceased following their transfer of duties in this matter to CRW?

Thank you for your prompt attention to this request.

Sincerely,

Lisa Widawsky Hallowell  
Senior Attorney  
Environmental Integrity Project  
(202) 294-3282

**CONFIDENTIAL LEGAL COMMUNICATION:** *The information transmitted is intended only for the person or entity to whom it is addressed, and may contain privileged and confidential attorney-client communications and/or confidential attorney*

*work product. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.*